



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 5, 2021

BY ECF

The Honorable Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Keith Halliburton & Jeremiah Young*, No. 20 Cr. 499 (LTS)

Dear Judge Swain:

The Government writes with the consent of the defendants to request a 30-day adjournment of the pretrial conference currently scheduled in this matter for January 8, 2021, at 10:30 a.m. The Government further requests an exclusion of time under the Speedy Trial Act until the new date for the conference.

On August 7, 2020, defendant Jeremiah Young was arrested after traveling from Indiana to Manhattan to pick up six kilograms of sham heroin from an undercover law enforcement officer. The next day, Young was charged by complaint with one count of conspiracy to distribute or possess with intent to distribute narcotics, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). On August 28, 2020, defendant Keith Halliburton was arrested in Illinois for his role in coordinating the transaction between Young and the undercover officer. Halliburton was also charged by complaint with one count of conspiracy to distribute or possess with intent to distribute narcotics, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). On September 21, 2020, the grand jury returned an Indictment charging both defendants with the same conspiracy count. Dkt. No. 7. The Government has since completed producing discovery.

The Government writes on behalf of the parties to request a 30-day adjournment of the pretrial conference currently scheduled in this matter for January 8, 2021, at 10:30 a.m. An adjournment will permit the parties additional time to discuss a pretrial resolution of this matter, and will permit the defendants – who are both in custody – and their counsel additional time to review the discovery in this matter under challenging circumstances presented by the COVID-19 pandemic. Counsel for both defendants consent to this request.

The Government further moves to exclude time under the Speedy Trial Act from January 8, 2021, until the new date for the pretrial conference. The Government submits that the ends of justice served by such a continuance outweigh the best interests of the public and the defendant in a speedy trial because the continuance is designed to ensure the effective representation of counsel in the face of difficulties posed by the COVID-19 pandemic, to permit the parties to engage in

discussions regarding a potential pretrial resolution of this matter, and to reflect the limited availability of jury trials in this District in light of the COVID-19 pandemic.

Respectfully submitted,

The foregoing adjournment and exclusion requests are granted, for the reasons stated above. The conference is adjourned to February 26, 2021, at 9:00 a.m. and speedy trial time is excluded through that date. DE# 20 resolved. SO ORDERED.

1/7/2021

/s/ Laura Taylor Swain, USDJ

AUDREY STRAUSS
Acting United States Attorney

by:



Kedar S. Bhatia
Jacob R. Fiddelman
Assistant United States Attorneys
(212) 637-2465/1024